

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V -DRAFT PERMIT No. V-02-003

WKEC-COLEMAN STATION

Hawesville, Kentucky 42348

December 21,2001

HERBERT CAMPBELL

PLANT I.D. # 21-091-00003

APPLICATION LOG # 50043

SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATE:

- E. Unit 01: Dry-bottom, wall-fired, pulverized coal-fired unit equipped with electrostatic precipitator constructed on 1966. Secondary fuel is e-fuel.
- E. Unit 02: Dry-bottom, wall-fired, pulverized coal-fired unit equipped with electrostatic precipitator constructed on 1966. Secondary fuel is e-fuel.
- E. Unit 03: Dry-bottom, wall-fired, pulverized coal-fired unit equipped with electrostatic precipitator constructed on 1968. Secondary fuel is e-fuel.
- E. Unit 04: Coal conveying and handling operations include receiving hopper, conveyors, secondary crusher, coal stockpiles, and haul roads constructed on or before 1966.
- E. Unit 05: Coal conveying and handling operations include conveyors, transfer points and bunkers for Units 1,2, & 3 constructed on or before 1966.
- E. Unit 07: Ash and Sludge Handling operations constructed on or before 1966.

REGULATION APPLICABILITY:

Regulation 401 KAR 61:015, Existing indirect heat exchangers, and Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances. All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on definition or size of emission units, or applicability date of regulations.

Regulations not applicable to emissions unit 1, 2, and 3 due to applicability date or size of unit:

Regulation 401 KAR 59:015, New indirect heat exchangers, and 401 KAR 60:005 New Source Performance Standards incorporating by reference 40 CFR 60 Subpart D, Standards of performance for fossil-fuel-fired steam generators, applicable to an emission unit with a capacity of more than 250 mmBTU per hour and commenced on or after August 17, 1971.

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Regulation 401 KAR 59:016, New electric utility steam generating units, and 401 KAR 60:005 New Source Performance Standards incorporating by reference 40 CFR 60 Subpart Da, Standards of performance for electric utility steam generating units applicable to an emission unit with a capacity of more than 250 mmBTU per hour and commenced on or after September 19, 1978.

Regulation 401 KAR 60:005, New Source Performance Standards, incorporating by reference 40 CFR 60 Subpart Db, Standards of performance for industrial-commercial-institutional steam generating units applicable to an emission unit of greater than 100 mmBTU/hour and constructed after June 19, 1984.

Regulation 401 KAR 60:005, New Source Performance Standards incorporating by reference 40 CFR 60 Subpart Dc, Standards of performance for small industrial-commercial-institutional steam generating units, applicable to an emission unit with a design maximum heat input capacity of 100 mmBTU/hour or less and greater than or equal to 10 mmBTU/hour and constructed after June 9, 1989.

Regulation not applicable to emissions unit 4 (coal handling):

Regulation 401 KAR 60:005, New Source Performance Standards incorporating by reference 40 CFR 60, Subpart Y, Standards of performance for coal preparation plants.

COMMENTS:

- The permittee has not proposed any alternate operating scenario for any of the emission units.
- This permit does not impose any emission cap on any of the emission units.
- This source is subject to acid rain requirements and the Division has issued Phase II acid rain permit for this facility; Permit Number AR-98-006. The acid rain permit renewal will become section J of the new permit.
- The permittee may assure compliance with sulfur dioxide allowable standards for emissions units 1, 2, and 3 by using sulfur dioxide continuous emission monitoring data.
- The permittee will be required to conduct at least two particulate performance tests for emissions units 1, 2, and 3 to demonstrate compliance with allowable standards within the term of this permit. The permittee may assure continuing compliance with particulate standard using COM data as an indicator as described in the permit. Additional stack tests for particulate may be required under the circumstances described in the permit.
- Emissions units 4 and 5 are subject to Regulation 401 KAR 63:010, Fugitive emissions and are considered to be in compliance when using control measures required by the regulation.

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- The three hour averaging time associated with the particulate standard for emissions units 1, 2, and 3 is applicable during compliance demonstration through performance tests if one is required by the Division.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.